



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

Via Electronic Mail and US Postal Service

7005 3110 0002 8247 7423

August 28, 2014

Mr. Daniel Tisoncik
Management Director of Environmental Affairs - Liability
United Airlines, Inc.
233 S. Wacker Drive – 28th Floor
Chicago, Illinois 60606

Re: EPA Approval of the Workplan for Phase II Dust Sampling for Polychlorinated Biphenyls and Evaluation of Risk Assessment for Building 10, United Airlines San Francisco Maintenance Center, San Francisco International Airport

Dear Mr. Tisoncik:

Thank you for your submission of the *Workplan for Phase II Dust Sampling for Polychlorinated Biphenyls and Risk Assessment for Building 10*, dated July 2014 (Workplan and Risk Assessment), prepared by Environmental Resources Management (ERM) on behalf of United Airlines, Inc. (UA), proposing removal of dust containing polychlorinated biphenyls (PCBs) and presenting a tiered human health risk assessment to address PCBs in dust that remain in an isolated area within Building 10 at the UA San Francisco Maintenance Center at the San Francisco International Airport (Site). The U.S. Environmental Protection Agency (USEPA) is issuing this risk-based approval under the Toxic Substance Control Act (TSCA) pursuant to 40 C.F.R. § 761.61(c) requiring UA to implement the Workplan consistent with the terms provided below (Approval). This Approval only covers dust mitigation within the Paint Shop in Building 10 where PCB concentrations above the action level were detected. This letter also addresses the risk assessment portion of the Workplan and Risk Assessment that was prepared to address PCBs in dust on top of a storage bin in the southwestern portion of Building 10, which exceeded the established action level.

Dust sampling and analysis was conducted in July 2013, in accordance with United's *Revised Workplan for PCB Investigation, Risk-Based Screening, and Remedial Action for Buildings 10 and 15*, dated February 28, 2013 (*Revised Workplan*). Results of the dust investigation in Buildings 10 and 15 indicated that PCBs were detected at concentrations above the action level in two areas of Building 10; the Paint Shop and in one sample on top of a storage bin in the southwestern portion of the building, adjacent to the stairway. To address these detections, United prepared the Workplan and Risk Assessment, which proposes to thoroughly remove the dust in the Paint Shop in Building 10, evaluate health risks for worker exposure to PCBs in dust in the southwestern portion of Building 10 and proposes no further actions in Building 10 outside of the Paint Shop.

Based on USEPA's review, UA shall implement the following in two areas of concern in Building 10 at the Site:

- **Paint Shop.** USEPA hereby approves the dust removal and sampling activities in the Paint Shop as described in the Phase II Dust Sampling Workplan.

- **Building 10 (Except Paint Shop).** USEPA has reviewed the risk assessment developed by UA to evaluate the level of risk remaining at the Site from the PCB detection on the southwestern part of Building 10 that slightly exceeded the action level during the dust sampling activities in July 2013. UA made adjustments to the screening risk calculations to account for modifications to the current use of the area in Building 10 where the isolated PCB concentration was detected. The use of this area in Building 10 has been modified from Tire Shop to storage area. According to UA, now that Building 10 is used as a storage area, aircraft workers are no longer present in Building 10; thus decreasing frequency of worker exposure in the risk calculations. UA concluded that because potential exposure to PCBs in dusts in Building 10 (excluding the Paint Shop) are considered to pose a negligible, acceptable risk to workers, no further assessment or remedial action is warranted in Building 10 dust (excluding the Paint Shop). Based on USEPA's review of UA's risk assessment one of the following options shall be selected to address dust remaining in Building 10 (except the Paint Shop):
 1. The exposure frequency assumed in the risk assessment calculations was based on the change in use of Building 10 (excluding the Paint Shop). If UA opts to leave PCBs in dust in place in Building 10, and conduct no further action, UA must amend their facility's environmental management plan to indicate that the use of Building 10 shall not be modified without first notifying and obtaining approval from USEPA to do so and include the same specification in the land use covenant for the facility.
 2. If UA prefers to not have such restrictions on the use of Building 10, UA may propose a process to remove PCB-impacted dust in Building 10 in a similar manner that was proposed for the Paint Shop.

UA shall notify USEPA of the option selected within 30 days of issuance of this Approval. UA must obtain USEPA approval of the selected option prior to its implementation.

As a result of project scoping discussions between UA and the USEPA, UA has proposed a phased approach for characterization and remediation work at the Site. The initial phases have involved only Buildings 10 and 15. Subsequent phases, which may require one or more TSCA PCB approvals to be issued by USEPA, will focus on other areas at the Site, including outdoor areas.

This Approval does not relieve the property owner or UA from complying with all applicable federal, state, and local regulations and permits, nor does it exempt or waive any requirement to obtain additional cleanup orders, approvals or permits pursuant to other regulatory programs, where warranted. UA is also under a continuing obligation to comply with all requirements of TSCA regardless of whether or not such requirements are contained within this Approval. Departure from the terms and conditions of this Approval without written permission from USEPA may result in the revocation of this Approval and/or appropriate enforcement action. Nothing in this Approval limits USEPA's ability to seek penalties or pursue other legal action, including compliance orders or criminal proceedings, for violations of the terms or conditions of this Approval or of applicable federal, state or local law (including other TSCA PCB requirements).

Finally, USEPA reserves its right to require additional characterization and/or remediation work of PCBs by UA or other potentially responsible parties, as warranted and allowed by law.

Daniel Tisoncik
Re: USEPA Conditional Approval – Workplan and Risk Assessment
Date: April 28, 2014

We look forward to assisting you during implementation of the approved Revised Workplan as modified by this Approval. If you have any questions concerning this Approval, please contact Cynthia Ruelas at (415) 972-3329. Thank you for your cooperation.

Sincerely,



Jeff Scott, Director
Waste Management Division

Electronic cc: Gladston Taylor, UA
Terri Herson, ERM